

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JUAN JOSE SALGUERO, OLVIN RAMON  
RODRIGUEZ, ALICIA RIVERIA GARCIA, THANIA  
VELASCO, CARLOS ROBERTO GARCIA, and  
YOVANY SIFORTES PINTO, on behalf of themselves  
and all others similarly situated,

Civil Action No.: 12-CV-0635  
(JFB)(AKT)

Plaintiffs,

-against-

JVK OPERATIONS LIMITED, VINOD SAMUEL,  
and MICHAEL CONNELL,

Defendants.  
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**NOTICE OF PLAINTIFFS' MOTION FOR APPROVAL OF ATTORNEYS' FEES  
AND REIMBURSEMENT OF EXPENSES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, and in the Declaration of James W. Versocki in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Reimbursement of Expenses and Plaintiffs' Motion for Approval of Class Representative Service Awards, Plaintiffs respectfully request that the Court enter an Order:

- (1) awarding Class Counsel attorneys' fees in the amount of \$157,258;
- (2) awarding Class Counsel costs in the amount of \$2,753.26; and
- (3) granting such other, further, or different relief as the Court deems just and proper.

Dated: July 21, 2015  
Melville, New York

Respectfully submitted,  
ARCHER, BYINGTON, GLENNON & LEVINE, LLP

By: /s/ James W. Versocki  
James W. Versocki

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*Attorneys for Plaintiffs and the Proposed Class*